

**United States Department of the Interior
Bureau of Land Management**

Environmental Assessment

DOI-BLM-CO-S054-2013-0041 EA

October 2014

Carnation Road Buckwheat Protection

*Location: Gunnison Gorge National Conservation Area
6200 Road*

**U.S. Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 South Townsend Avenue
Montrose, CO 81401
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NUMBER: DOI-BLM-CO-S054-2013-0041 EA

PROPOSED ACTION TITLE: Carnation Road Buckwheat Protection

LOCATION/LEGAL DESCRIPTION: T. 51 N., R. 9 W., Section 29 SE $\frac{1}{4}$ SE $\frac{1}{4}$, and
Section 30 NW $\frac{1}{4}$ SW $\frac{1}{4}$

APPLICANT: Bureau of Land Management, Gunnison Gorge National Conservation Area

INTRODUCTION and BACKGROUND

Surveys recently conducted by BLM for the endangered Clay-loving wild buckwheat (*Eriogonum pelinophilum*) have documented that several large populations within Gunnison Gorge National Conservation Area south of 6200 Road (also known as Carnation Road) are being negatively impacted by motorized travel adjacent to an authorized OHV route and unauthorized user created OHV routes (**Figure 1**), as well as unauthorized target shooting. Compliance with the existing Land Use Plan and meeting the legal requirements of the Endangered Species Act has resulted in the need to develop a reasonable method of protecting this population from further detrimental impacts (**Photo 1-4**).

Under the Gunnison Gorge National Conservation Area (GGNCA) Resource Management Plan (November 2004), motorized travel in the project area is limited to designated routes. Within the project area the only designated route is the route labeled Carnation Cutoff in **Figure 1**.

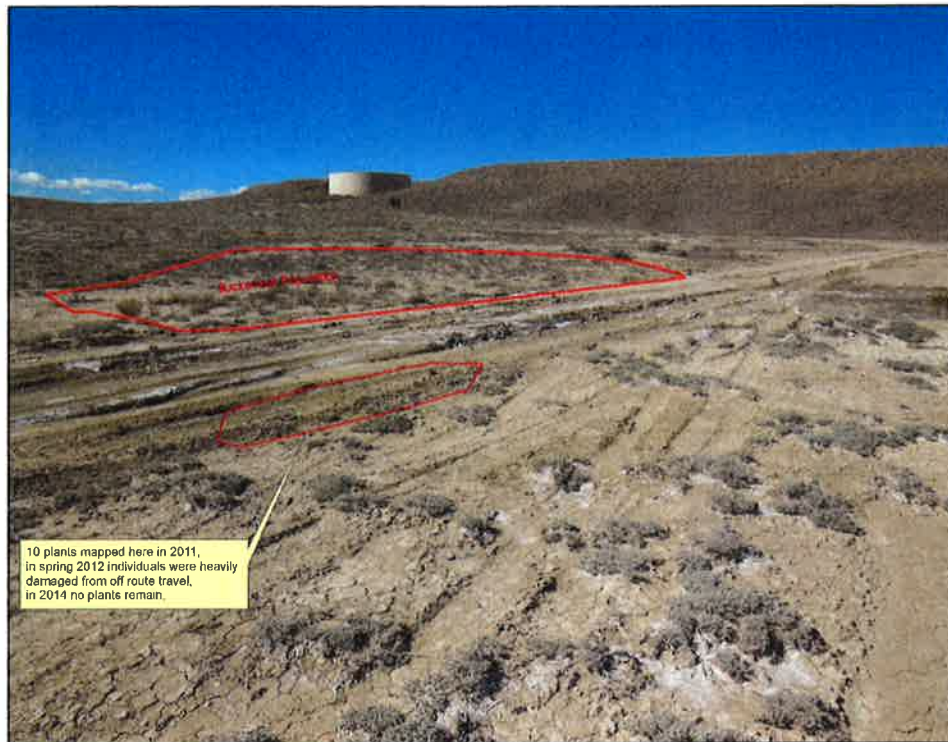


Photo 1 Off-route travel damage to buckwheat population and habitat just south of 6200 Road

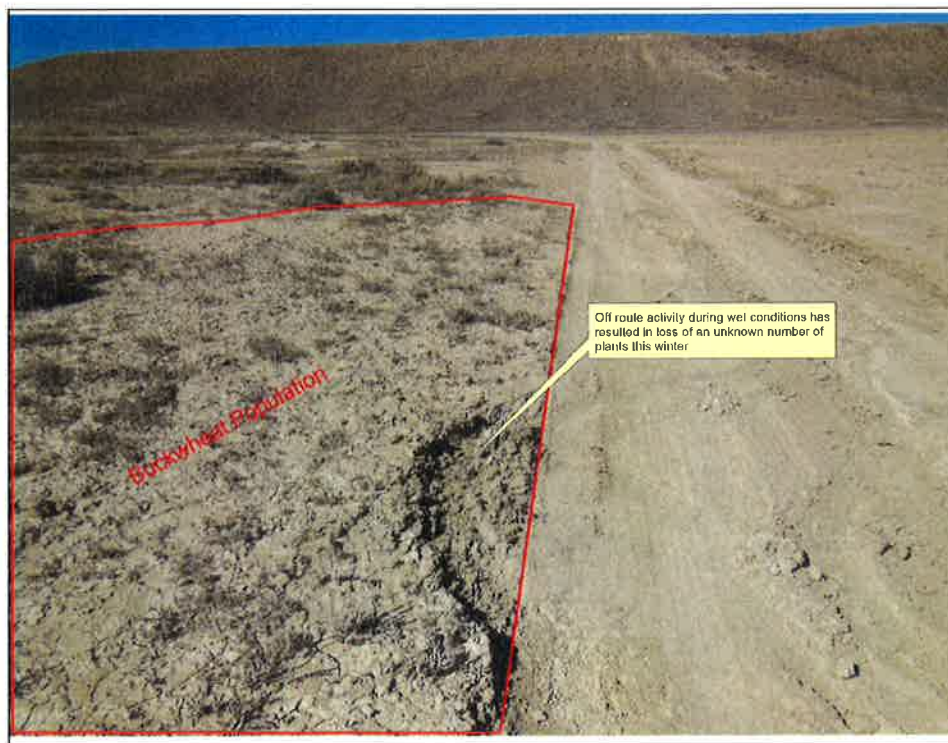


Photo 2 Buckwheat damage resulting from route travel during wet conditions

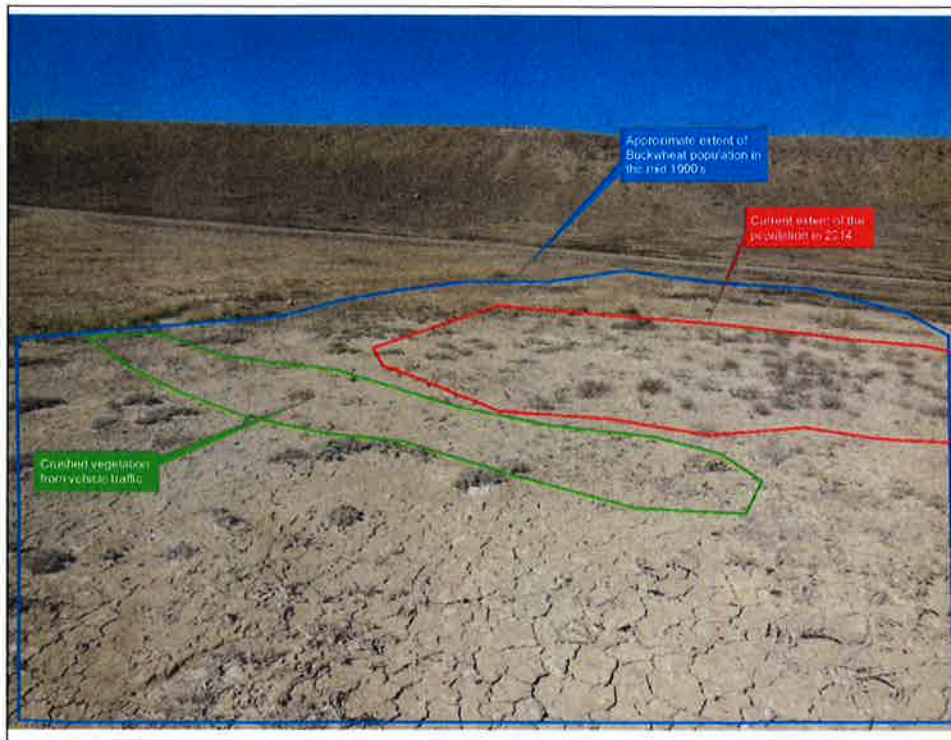


Photo 3 Buckwheat population that has been reduced by approximately ½ due to burgeoning user created parking area.



Photo 4 Additional off route travel that has impacted northern most population (photo 3) of Buckwheat between 3/1-3/18/2014

PURPOSE AND NEED FOR THE ACTION:

The purpose of the action is to eliminate the adverse impacts to the endangered Clay-loving wild buckwheat that are occurring in the action area from recreational activities.

The need is to comply with the Endangered Species Act Sec. 9(a)(2)(B) which requires the BLM to take action when damage or destruction of a federally protected species is occurring on lands managed by the agency.

Decision to be made

Decide whether to implement the proposed action to close and abandon 0.74 miles of designated road and the associated user created routes and to fence the southern side of 6200 Road to deter motorized use of the area and eliminate impacts to the endangered Clay-loving wild buckwheat, or to implement one of the alternatives.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Proposed Action:

A. Description of the Proposed Action and any applicable mitigation measures

The proposed action consists of constructing a fence to exclude vehicular travel on and through the populations. Public access would be limited to foot and horse travel only. This fencing effort would result in a 2,350 foot long fence paralleling the south side of 6200 Road which would block and permanently restrict vehicle access to existing and user created routes through these large populations of Clay-loving wild buckwheat **Figure 1**. A second segment of fence would be constructed at the southern end of the project area to block off and permanently restrict vehicular use coming from the south off of the Candy Lane Road. This would result in the closure of 0.74 miles of road that was designated in the GGNCA land use plan. Two locked gates would be added to provide administrative access to the service routes for the Tri-State Montrose to Delta 320 KV powerline right-of-way, one along the junction of the powerline service route and 6200 Road, and one at the proposed closure site near Candy Lane. Limiting the powerline service route to administrative use only would be necessary in order to facilitate the recovery of these populations and to prevent recreational vehicle access to the populations from other locations, while still allowing Tri-State necessary access to the permitted right-of-way.

The fences would be constructed out of woven wire and be constructed to BLM standards depicted in **Figure 2**.

The fence would parallel 6200 Road (Carnation Rd) starting on the west end at the ridge top approximately 150 feet west of an unauthorized user created single track route, just south of the water tower, and continue in a northeasterly direction along the south side of the existing county road for approximately 2,350 feet until it ties in with the substantial and unnavigable wash just southeast of Carnation Road. Due to the wash's unnavigable nature it would serve as the northeastern boundary (**Photo 5**). The northwestern terminus of the 6200 Road (Carnation Rd) and both ends of the southern Candy Lane area fence would be situated mid-slope on very steep

slopes which should deter circumvention of these fences. Should user created recreational impacts continue to be observed on the south side of the proposed fence then the protective fencing would be extended as necessary and designated routes closed to appropriately protect these populations of buckwheat, while considering cost and impacts to the resource. The fence line would be kept approximately 3.5 meters off of the existing 6200 Road (Carnation Rd) to allow for road maintenance except in instances where the Clay-loving wild buckwheat would be affected, in which case the fence would be moved closer to the existing road without impinging on the ability for the county to do appropriate maintenance. The southern fencing effort would also be extended as necessary to maintain effective closure of the southern end of the project area should compliance become an issue. The additional fencing, if necessary, would terminate at effective physical barriers to deter motorized use of the closed area. The site would then be allowed to recover naturally.

Figure 1. Proposed Action Map

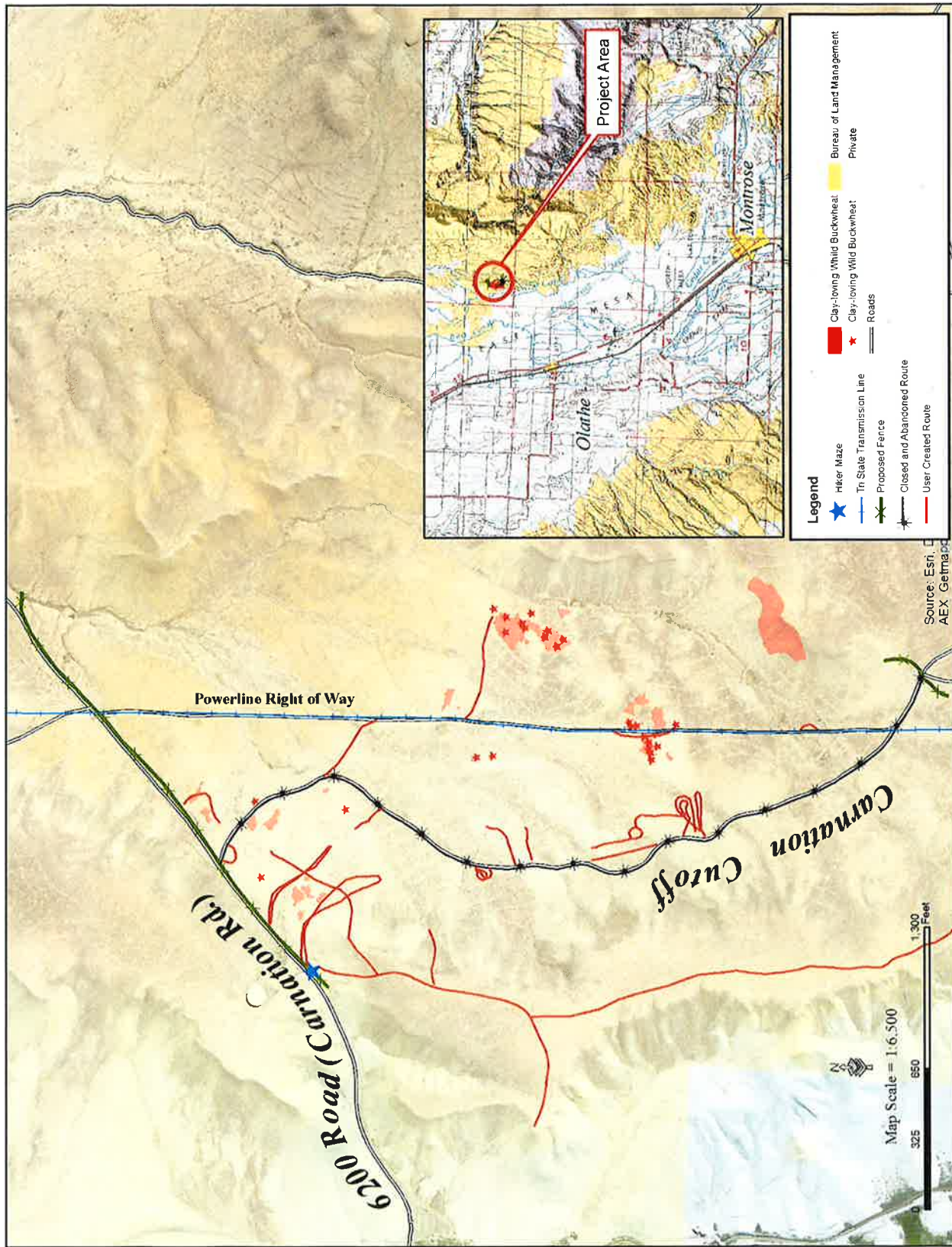




Photo 5. Substantial and unnavigable wash as the northeastern boundary.

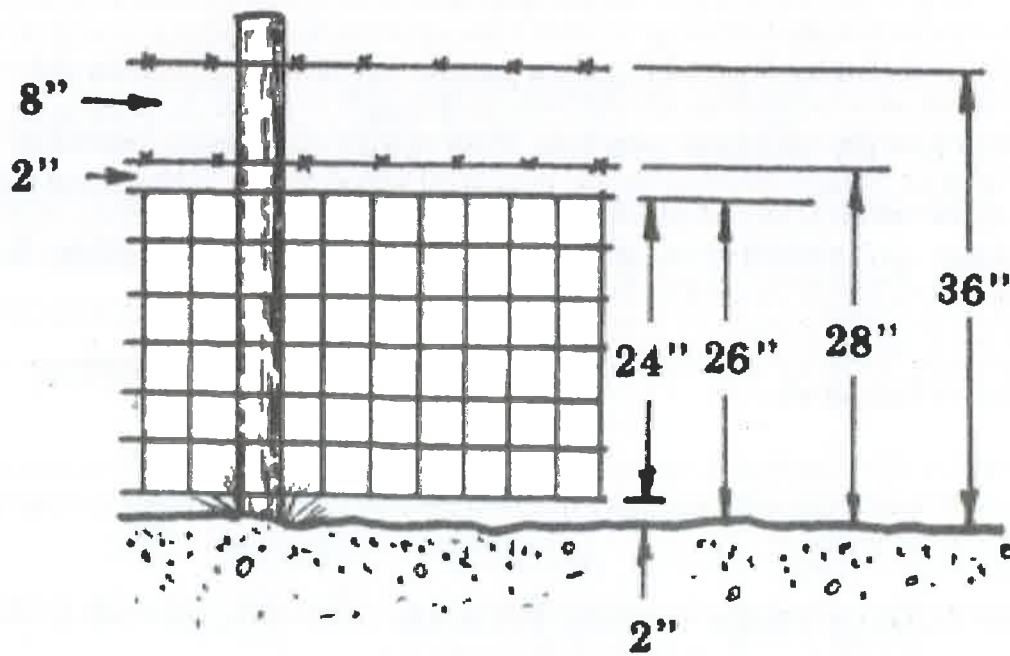


Figure 2. Sheep fence specifications

Design Features:

1. **Avoidance.** Work crews would take measures to avoid ground disturbance within 3 feet of any Clay-loving wild buckwheat plant and no posts would be installed within 3 feet of any plant. Crews would access fencing locations through pre-existing roads, or take appropriate measures to minimize ground disturbance in un-occupied habitat. Off-highway vehicle use would be restricted to existing routes around or through occupied habitat (**Figure 1**). These designated areas would be flagged by a qualified compliance biologist and all plants within 3 feet would be flagged and avoided by construction activities.
2. **Employee Education.** A worker education and awareness program for Clay-loving wild buckwheat would be developed and presented by BLM to all personnel who work on the project. No personnel would be allowed to work on the project until they have completed this orientation. The program would include: (1) Information on the legal and biological status of Clay-loving wild buckwheat, (2) what habitats are important to the species, (3) where occurrences are located on the project area, (4) awareness of mandatory conservation measures, (5) information on fines and penalties for damaging or directly impacting Clay-loving wild buckwheat, and (6) reporting procedures should any violation occur. If any Clay-loving wild buckwheat plants are directly impacted by project activities, construction would be halted immediately and consultation with the Service would be re-initiated.
3. **Biological Monitoring.** The BLM would be on-site for certain construction activities with the greatest likelihood for impacting adjacent Clay-loving wild buckwheat. These activities include the following: (1) Initial fence post location flagging, and (2) fence installation. It is the responsibility of the construction manager to maintain and communicate a construction schedule with the biologist to ensure that monitoring activities are planned for and carried out. Prior to fence construction, a qualified compliance biologist must survey and pin flag all Clay-loving wild buckwheat plants along the fencing route and all fencing activities must be monitored by the compliance biologist. Crews would be required to work in dry conditions and to avoid any direct impacts to Clay-loving wild buckwheat plants.
4. Work with Tri-State to ensure that appropriate administrative access is maintained for the powerline right-of-way.
5. Signage will be installed at the ends of the closed Carnation Cutoff road where it will intersect open routes with fencing, explaining the reason for the closures and alternative routes to the public.
6. A small hiker maze will be installed in the fence just south of the water tank to allow foot access to the area away from buckwheat populations.
7. Regular patrols of the closed area would be made by BLM staff to monitor the effectiveness of the closures. Where damage to the fences is observed they would be

promptly repaired. Patrols would also monitor for potential circumvention of the fences and assess the need to extend them accordingly.

- Law Enforcement: The project site would be added to the list of routine stops for GGNCA patrol route (once /week)
 - Remainder of BLM staff: at least twice a month for the first year, patrols could be reduced to once a month if compliance is observed.
 - BLM will solicit its partners to develop a site steward program for the project area to also help increase monitoring presence (i.e. Colorado Natural Areas Program, Colorado Canyons Association, or members of the Colorado Native Plant Society)
8. The project area will be monitored annually for a minimum of three years for noxious weeds. Should noxious weeds be found within the project area they would be treated in accordance with the Uncompahgre Field Office Weed Management Plan (DOI-BLM-CO-S050-2012-0029 EA).

Alternative 1

Alternative 1 would consist of constructing two separate segments of fence to exclude OHV activity on and through the populations that occur along the Carnation Cutoff road.

This fencing effort would result in two segments of fences totaling 10,084 feet paralleling 6200 Rd (Carnation Rd) which would block vehicle access to the user created routes closest to 6200 Road similar to the Proposed Action. Rather than closing the designated road the fences would then parallel either side of the Carnation Cutoff road ensuring users remain on the road past those populations that are directly adjacent to this road **Figure 3**. The parallel fences would extend south to the proposed road closure fence location depicted in the Proposed Action map (**Figure 1**). A locked gate would be added to provide administrative access to the service routes for the Tri-State Montrose to Delta 320 KV powerline right-of-way at the junction of the powerline service route and 6200 Road (Carnation Rd) and at the intersection of the Tri State line and the Carnation Cutoff road limiting the powerline service route to administrative use only.

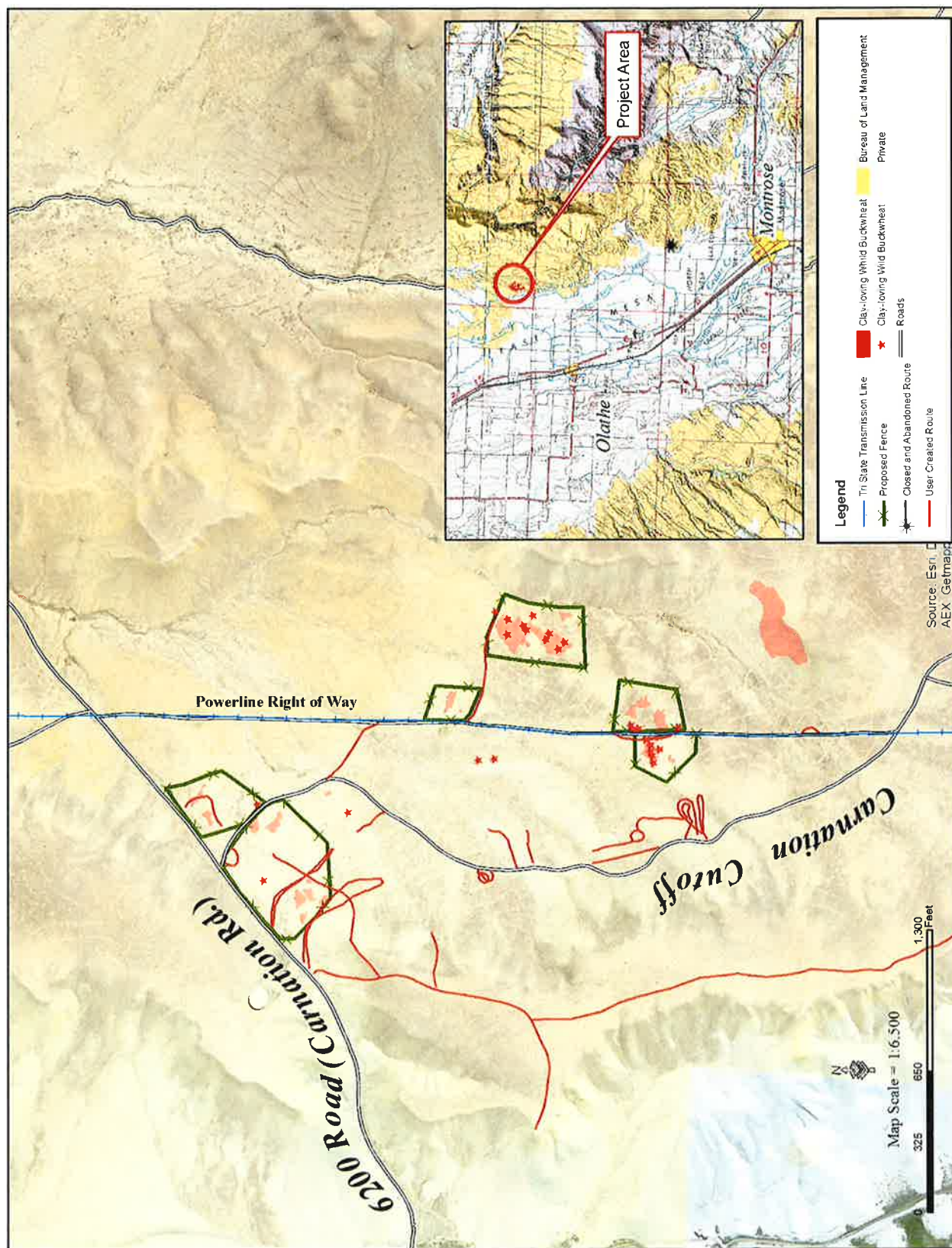
A small hiker maze will be installed in the fence just south of the water tank to allow foot access to the area away from buckwheat populations

[illegible]

Alternative 2

This alternative would consist of constructing six exclosures around those populations of clay-loving wild buckwheat, to exclude OHV activity on and through the populations, where off route travel has damaged or destroyed plants and/or habitat (**Figure 4**). The exclosures would range in size from approximately 0.73 acres to approximately 4.8 acres and be constructed to BLM standards depicted in **Figure 2**. The exclosures are proposed to be constructed out of woven wire to prevent sheep from possibly being entrapped in the exclosures. A woven wire fence would be constructed by work crews on foot where the proposed fence line would not be adjacent to existing full sized vehicle routes. Should additional off route use be observed on the remaining unfenced buckwheat populations those populations would also have exclosures constructed around them to eliminate impacts as necessary. No routes would be closed under this alternative.

Figure 4 Alternative 2 Map



SCOPING, PUBLIC INVOLVEMENT AND ISSUES

A total of 17 written comments were received as a result of the public scoping effort conducted from 5/7/2014 to 6/6/2014. Eleven comments were largely votes for a particular alternative, and 6 of the comments were substantive in nature offering improvements to the proposal or rationalizing why one alternative achieved the end goal better than another.

Public Comments included:

- Suggestions for removal of the proposed parking area along 6200 road to eliminate human use concentration near the buckwheat populations, (this has been incorporated into the proposed action)
- Install signs explaining purpose of the road closures, (this has been incorporated into the proposed action)
- Extend fences in alternative 1 the length of the Carnation cutoff Road (this has been incorporated into alternative 1)
- Include measures that would address accidental, as well as intentional, damage to or disregard of the fences.
- Increase signage indicating off route restrictions, publicize purpose and need for off route restrictions in the local media,
- Engage local OHV user groups in discussion of the route restrictions and adverse impacts to endangered plant populations.
- The proposed EA is not a travel management action and therefore no discussion or analysis of route closures or restrictions should take place in this process.
- Given financial limitations analyze the most cost effective conservation measure
- BLM must consider increasing enforcement because fencing and signage alone are demonstrably insufficient to prevent unauthorized OHV use
- Alternatives 2 & 3 offer less protection for the plants than 1 due to potential for continued degradation of habitat or populations not proposed for enclosures.
- It is unrealistic to expect long term survival of this species if only small isolated islands of populations (Alt 3) are protected with enclosures. The ecological, hydrological and other natural processes should be preserved in larger areas beyond only those where the plants are now located.

The BLM Uncompahgre Field Office staff identified the following issues that should be analyzed:

- The project area is inhabited by the endangered Clay Loving Wild Buckwheat where off route travel has resulted in adverse impacts to the populations in the project area. Impacts to the species defined the need for the action.
 - How would each alternative affect the direct (trampling) and indirect (dust, habitat modification, conservation of habitat for the species) impacts to federally listed plant species? How would access and transportation be affected?
- How would recreation opportunities and use patterns be affected?

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5-3):

LUP Name: Gunnison Gorge National Conservation Area RMP

Date Approved: November 2004

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

SSS-C-16 If large or particularly unique occurrences or populations of sensitive plants are found, the sites will be protected as needed and required through such actions as fencing or closure to OHV use, mineral entry, mineral material disposal, or other activities that are not compatible with maintenance of rare plant populations.

SSS-C-17 BLM will take special management actions to promote and protect special status species. Special status species include listed species, proposed species, candidate species, state listed species and sensitive species. Actions could include, but will not be limited to modification of existing uses or practices to eliminate or mitigate the negative impact, or closing areas to certain types of use.

SSS-C-18 BLM will remove OHV traffic, concentrated livestock use, such as domestic sheep bed grounds, or other impacting uses from known population sites of Clay-loving wild buckwheat or other special status species.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

Bureau of Land Management. 2004. Gunnison Gorge National Conservation Area Proposed Resource Management Plan and Final Environmental Impact Statement. BLM Gunnison Gorge NCA Office. Montrose, Colorado.

Standards for Public Land Health: In January 1997, Colorado Bureau of Land Management (BLM) approved the Standards for Public Land Health. Standards describe conditions needed to sustain public land health and relate to all uses of the public lands. A finding for each standard will be made in the environmental analysis (next section).

Standard	Definition/Statement
#1 Upland Soils	Upland soils exhibit infiltration and permeability rates that are appropriate to soil type, climate, land form, and geologic processes. Adequate soil infiltration and permeability allows for the accumulation of soil moisture necessary for optimal plant growth and vigor, and minimizes surface runoff.
#2 Riparian Systems	Riparian systems associated with both running and standing water, function properly and have the ability to recover from major surface disturbances such as fire, severe grazing, or 100-year floods. Riparian vegetation captures sediment, and provides forage, habitat and bio-diversity. Water quality is improved or maintained. Stable soils store and release water slowly.
#3 Plant and Animal Communities	Healthy, productive plant and animal communities of native and other desirable species are maintained at viable population levels commensurate with the species and habitat's potential. Plants and animals at both the community and population level are productive, resilient, diverse, vigorous, and able to reproduce and sustain natural fluctuations, and ecological processes.
#4 Threatened and Endangered Species	Special status, threatened and endangered species (federal and state), and other plants and animals officially designated by the BLM, and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.

#5 Water Quality	The water quality of all water bodies, including ground water where applicable, located on or influenced by BLM lands will achieve or exceed the Water Quality Standards established by the State of Colorado. Water Quality Standards for surface and ground waters include the designated beneficial uses, numeric criteria, narrative criteria, and anti-degradation requirements set forth under State law as found in (5 CCR 1002-8), as required by Section 303(c) of the Clean Water Act.
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AFFECTED ENVIRONMENT and ENVIRONMENTAL CONSEQUENCES

This chapter provides a description of the human and environmental resources that could be affected by the Proposed Action and presents comparative analyses of the direct, indirect and cumulative effects on the affected environment stemming from the implementation of the Proposed Action and other alternatives.

Potential effects to the resources/concerns in the table (below) were evaluated to determine if detailed analysis is necessary. Consideration of some elements is to ensure compliance with laws, statutes, regulation or Executive Orders that impose certain requirements upon all Federal actions. Other items are relevant to the management of public lands in general, the Standards for Public Land Health, or to the BLM Uncompahgre Field Office (UFO) in particular.

Elements	¹ Not Present	² Present / No Analysis Needed	³ Present / Requires Further Analysis	Rationale if not Analyzed
Air Quality		X		Air quality impact is already minor. These would be improved by eliminating off-road travel. Analysis would not provide information to help with a decision.
ACEC	X			The project is not within or adjacent to any ACECs.
Wilderness	X			The project is not within or adjacent to any wilderness or WSA.
Lands with Wilderness Characteristics	X			The project is not within or adjacent to inventoried land with wilderness characteristics.
Wild and Scenic Rivers	X			The project is not within or adjacent to segments eligible or suitable for Wild and Scenic River designation.
Cultural		X		The project area has been inventoried for Cultural resource presence at a Class III level with negative results. There are no known or anticipated National Register or otherwise eligible historic properties within the project area and no further work is required.

Elements	¹ Not Present	² Present / No Analysis Needed	³ Present / Requires Further Analysis	Rationale if not Analyzed
Native American Religious Concerns	X			There are none known or anticipated in this area.
Farmlands, Prime/Unique	X			All land in the project area is federal and is not irrigated. The project area does not have any prime or unique farmlands.
Soils		X		Construction of fencing would not cause measureable impact to soils and road closures will reduce off route travel and erosion.
Vegetation		X		Construction of fencing would not cause measureable impact to vegetation resources and road closures will reduce off route travel which will eliminate potential impacts to vegetation. See the T&E section for information on clay-loving buckwheat.
Invasive, Non-native Species		X		The project is not expected to result in measurable surface disturbance which would cause expansion of invasive or nonnative species.
Threatened and Endangered Species			X	
Migratory Birds	X			The project area is a salt desert shrub community and currently no migratory species of conservation concern either nest or spend significant time foraging in habitat associated with the project. In addition the proposed fencing is not expected to have measureable impacts to migratory species moving through the project area.
Wildlife, Terrestrial	X			The project would have no measureable impacts on the terrestrial species that occupy the project area, the proposed fencing would not inhibit movement of any of the terrestrial wildlife species that occupy or derive important use of the project area.
Wildlife, Aquatic	X			The project does not involve aquatic resources and would have no measureable impact on aquatic species.

Elements	¹ Not Present	² Present / No Analysis Needed	³ Present / Requires Further Analysis	Rationale if not Analyzed
Wetlands & Riparian Zones	X			There are no wetlands or riparian zones associated with the proposed action.
Floodplains	X			No construction in the floodplain is proposed.
Water -- Surface		X		Fence construction would not cause measureable impact to surface water quality or quantity. Road closure would reduce the loss of vegetation and stabilize sediment.
Water -- Ground	X			No groundwater would be impacted by the project.
Wastes, Hazardous or Solid	X			The project is not likely to introduce hazardous or solid wastes.
Environmental Justice		X		The project will not disproportionately impact minority or low income populations.
Socio-Economics		X		The project would not have noticeable socio-economic impact. This topic was not brought up during scoping.
Access	X			The project would not have an impact on access within the Gunnison Gorge National Conservation Area. This topic was not brought up during scoping.
Transportation			X	
Cadastral Survey	X			There are not private lands in the area that pose a cadastral concern. If a fence is built, any cadastral marker would be protected.
Realty Authorizations		X		Regardless of alternative, administrative access will be provided to ROW holders along Carnation Cutoff Road.
Range Management		X		There would not be an impact to rangeland management from any of the alternatives. On-road administrative access would be allowed.
Forest Management	X			There are not forest resources associated with the proposed action.
Fire		X		The project area does not have a high fuel load. Any alternative would not prevent fire equipment from reaching a fire should one occur.
Noise		X		There would be short term

Elements	¹ Not Present	² Present / No Analysis Needed	³ Present / Requires Further Analysis	Rationale if not Analyzed
				generation of noise during project work. Long term, existing noise from vehicles would be eliminated. Noise is not impacted to the degree that detailed analysis is needed.
Recreation			X	
Visual Resources		X		All alternatives would be consistent with the Class IV management objectives for visual resource management.
Geology and Minerals		X		The proposed action or alternatives would not impact geology or minerals.
Paleontology	X			
Law Enforcement		X		The proposed action or alternatives would have a negligible impact on law enforcement. The road closure or exclosures would need to be enforced; this would be the same level of enforcement that is needed in other parts of the NCA, and would not add noticeably to the law enforcement workload.

¹Not present: the element is not present in the area impacted by the proposed or alternative actions.

²Present but no analysis needed: the element may be present, but not affected to a degree that detailed analysis is required.

³Present and requires further analysis: the element is present and requires further analysis because 1) analysis of the issue is necessary to make a reasoned choice between alternatives, or 2) analysis of the issue is necessary to determine the significance of impacts.

THREATENED, ENDANGERED, AND SENSITIVE SPECIES (includes a finding on Standard 4)

The Uncompahgre Field Office utilizes the U.S. Fish and Wildlife Service *Information, Planning, and Conservation System* (IPaC) to generate the most current species list to analyze the effects of a proposed action on threatened, endangered and candidate species and designated critical habitat for these species (USFWS 2012). In accordance with *BLM Manual 6840*, the goal of management is to prevent a trend toward federal listing or loss of viability for sensitive species.

TES WILDLIFE AND PLANTS REPORT (available in the project record) lists potentially

occurring federally listed species within the UFO and provides assessments for their occurrence within the project area (BLM 2014). Only those species where the project is within the known range of the species and with potential habitat or known occurrences are discussed below.

Clay-loving Wild Buckwheat

Clay-loving Wild Buckwheat (*Eriogonum pelinophilum*) is a low, slow-growing, and long-lived subshrub known only from Delta and Montrose Counties, Colorado. Thought to be confined to one occurrence at the time of listing, this species is currently known from 14 element occurrences (EOs) totaling approximately 278,600 individuals. Occupied habitat totaling over 582 acres is distributed across a range approximately 11.5 miles wide (east to west) and 28.5 miles long (north to south) (FWS 2009). The *5-Year Review* of this species by the Service (FWS 2009) presents a thorough review of the species' status.

Clay-loving wild buckwheat is a low growing, rounded, densely branched subshrub in the buckwheat family (Polygonaceae). Clay-loving wild buckwheat is endemic to the rolling clay (adobe) hills and flats immediately adjacent to the communities of Delta, Olathe and Montrose, Colorado. These barrens are inhospitable to only but the most adapted species. Species found in association with the clay-loving wild buckwheat include mat saltbrush, black sagebrush, shadscale, and Adobe Hills beardtongue, another local endemic. The unique soils that support clay-loving wild buckwheat populations are limited in their distribution. Clay-loving wild buckwheat plants are generally found within swales or drainages that are more mesic than surrounding areas. These swales are generally located in low-lying areas with rolling topography. Clay-loving wild buckwheat plants are associated with small areas where snow lingers longer than surrounding areas because of their north and east facing aspects (Ewing and Glenne 2009, p. 2).

This means that the clay-loving wild buckwheat is also very limited in habitat. Clay-loving wild buckwheat was listed as an endangered species in 1984 because of the extremely limited range of its habitat and the high risk of habitat loss. Increasing urban, residential, and agricultural development in the region poses to irreversibly alter the habitat they rely on to survive. On public lands, Off-Highway Vehicle (OHV) recreation can also have significant impacts to the species. These activities have and are currently causing direct loss of plants (Photos 1-4) and habitat, as well as have resulted in indirect negative affects to the species from changes in pollinator communities, habitat, hydrology, and fragmentation of populations.

Aside from the direct loss of Clay-loving wild buckwheat documented in photos 1-4 individuals, cars, motorcycles, and OHVs (collectively OHVs) have impacted *E. pelinophilum* habitat in several ways. Soil compaction has diminished water infiltration, destroyed soil stabilizers, and increased erosion (photo 6) from water and wind (OHV effects summarized in Ouren et al. 2007, pp. 1-225). Because of decreased soil moisture and increased compaction, plant size is generally reduced compared to plants in populations approximately 1 mile away in the Model Airplane and Peach Valley populations. Soil compaction also increases the potential for invasive, nonnative annuals and other early successional plants to establish rapidly in OHV routes (photo 1). Other impacts that are documented include edge effects (photo 2), fragmentation (photo 1), and dust impacts which occur from OHV use. The Mancos shale soils in the project area are vulnerable to

OHV impacts because the clay is especially vulnerable to compaction and because there are no rocks and little vegetation to resist erosion.



Photo 6 Erosion resulting from OHV travel which has induced route widening and weed proliferation on less traveled portion of the route in Carnation project area

On BLM lands within the GGNCA, travel is limited to designated routes only, except within open OHV areas where no Clay-loving wild buckwheat plants are known (GGNCA RMP 2004). Although OHV use is limited to designated routes within the GGNCA and the Carnation project area, noncompliance OHV use has resulted in 2.23 miles of off route disturbance from 20 distinct routes on the approximately 155 acres of Clay-loving wild buckwheat habitat within the project area. Of those 20 distinct routes, 6 or 30% have directly disturbed populations of Clay-loving wild buckwheat resulting in the impacts described above. In addition the proliferation of the parking area near the intersection of 6200 Rd and the Carnation Cutoff road has reduced the spatial extent of Clay-loving wild buckwheat from one contiguous population occupying 0.62 acres in the 1990's to two small subpopulations occupying 0.1 acres as mapped in 2013. This represents the most significant impacts to Clay-loving wild buckwheat documented to date in the Carnation project area.

Clay-loving wild buckwheat is a long-lived perennial. Data is limited, but recruitment appears to be sporadic and infrequent, numerous seedlings have been reported in only two studies (Lyon 2008, Holsinger 2012). These characteristics make recovery after OHV use long-term or unlikely. Plants are found only on roads with infrequent use and are absent from more well-travelled routes (BLM 2009, p. 22).

Environmental Consequences:

Proposed Action –

The proposed action would construct two segments of fence, totaling 2,727 linear feet, to serve as physical barriers to OHV vehicle use in occupied Clay-loving wild buckwheat habitat. Constructing the fences would have no direct impacts to the Clay-loving wild buckwheat populations in the project area. All installation activities would occur well outside mapped occurrences of the plants. This alternative would require 0.52 miles of fencing to achieve 155 acres of plant and habitat protection (Figure 5). The alternative is also the easiest alternative to monitor for trespass and violations and conduct maintenance on. The hiker maze described in the design features is not expected to have measurable direct or indirect impacts to Clay-loving wild buckwheat as the concentrated non-motorized use would be focused well away from identified sub-populations.

The indirect impacts from the proposed action, assuming OHV compliance, are anticipated to be entirely beneficial and fully take into account protecting and conserving habitat and natural processes in the area surrounding the identified plant populations.

Closing and abandoning the Carnation Cutoff road would eliminate the documented direct and indirect effects discussed in the Affected Environment. As well as stop the continued expansion of impacts including: damage or destruction of plants in other sub-populations, widening of routes due to erosion, sedimentation of undisturbed adjacent habitats, and weed proliferation from both the permitted and noncompliant uses occurring as a result of the road. Use of the Carnation Cutoff road has resulted in impacts particularly during wet conditions, when multiple users are traveling the designated route due to pulling off to allow others to pass (photos 1&2), pulling off the route to engage in recreational activity, and to engage in off route motorized activity. Additionally, closing the road will eliminate the continued expansion of the parking area at the intersection of 6200 road and Carnation Cutoff where the aerial extent of the Clay-loving wild buckwheat population has decreased by nearly 84% since the 1990's. Closing the area would also deter off route travel and remove the threat of continued route proliferation which is damaging to Clay-loving wild buckwheat and its associated habitat. The route closure will result in the removal of a threat of "High Imminence" on approximately 155 acres of occupied habitat. These documented impacts are contributing to the species being endangered or becoming extinct as described by the Fish and Wildlife Service (FWS 2009) in a National Conservation Area that was designated to conserve and protect lands with exceptional scientific, cultural, ecological, historical and recreation values through balanced management.

Cumulative Impacts –

Since 2008 the BLM and private land owners have implemented 3 actions to reduce detrimental impacts and protect clay-loving wild buckwheat within the Gunnison Gorge NCA. These actions have eliminated the threats that contribute to the species endangered status and overall conditions have improved for the protected populations at these sites. Successful implementation of the proposed action would incrementally contribute to diminishing threats to the clay-loving wild buckwheat as well as contribute to the recovery of the species as intended under the Endangered Species Act.

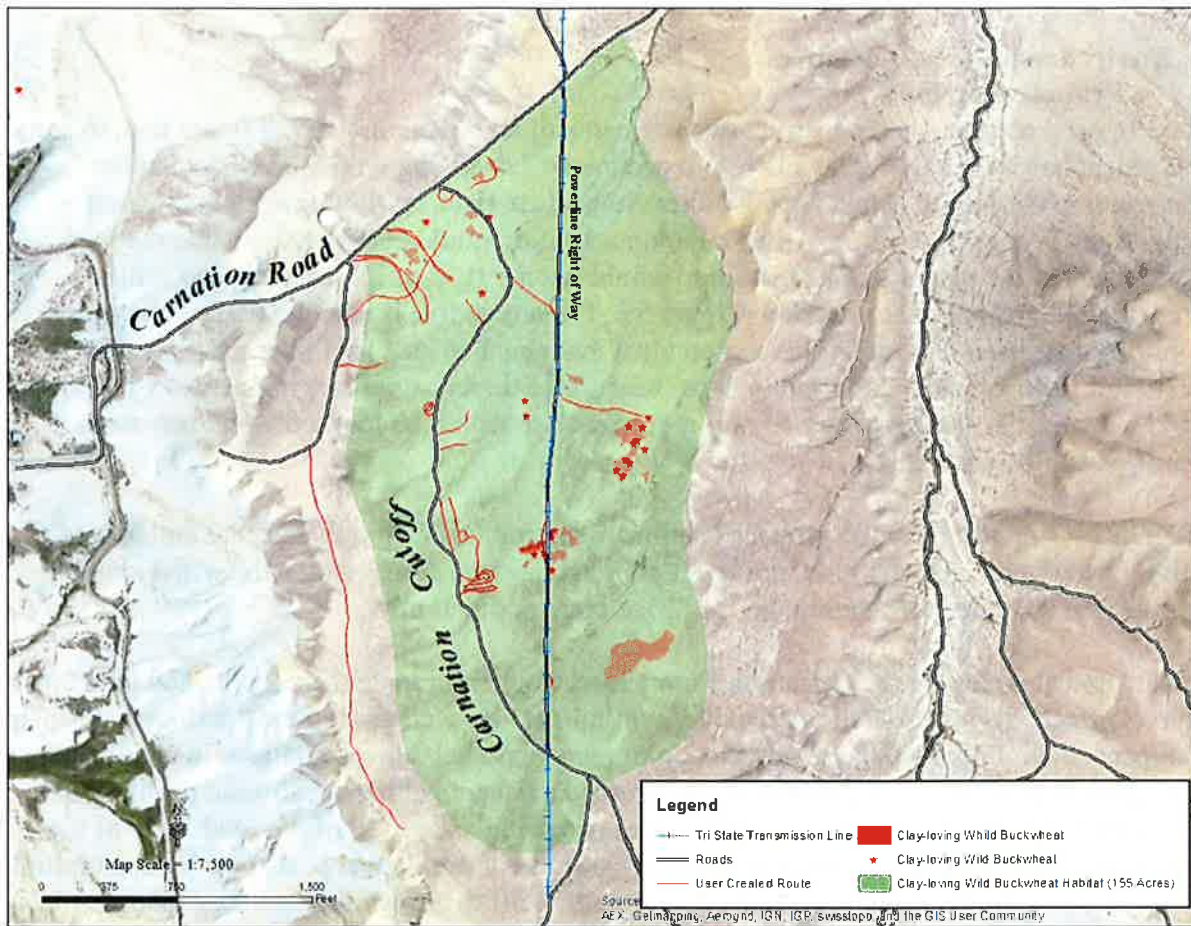


Figure 5 Clay-loving Wild Buckwheat Habitat

Alternative 1 –

This alternative as proposed would construct two segments of fence, totaling 10,084 linear feet, to serve as physical barriers to off route OHV vehicle use in occupied Clay-loving wild buckwheat habitat to the same southern closure point in the Proposed Action to achieve a similar level of protection for Clay-loving wild buckwheat habitat. Assuming a 20 foot buffer of the Carnation Cutoff road where impacts to the plants and habitat would be most pronounced this alternative will require 1.91 miles of fencing to achieve 151.4 acres of habitat protection for Clay-loving wild buckwheat habitat.

There is potential for direct damage to individual plants from implementing this alternative as there are plants that grow right up to the Carnation Cutoff road and individuals could be damaged or destroyed by workers constructing the fences. The same design features as the Proposed Action would be employed for this alternative but due to plants being directly adjacent to the fences some impacts to the plants are reasonably certain to occur. While this alternative would reduce the impacts from non-compliant off route travel it would fail to eliminate the impacts to Clay-loving wild buckwheat to the level that the proposed action does. There would still be impacts to habitat and those sub-populations closest to the Carnation Cutoff road from OHV use including erosion induced habitat alteration (photo 6), weed proliferation/persistence, dust deposition, and when wet conditions are present vehicles using the road could lose control

and damage the fences and those plants closest to the road (photos 1 & 2). In addition it would be very difficult and costly to install and maintain proper drainage features and grade the road due to the fences presence confining equipment to the running surface. Without proper maintenance the road surface is expected to continue to degrade which will exacerbate erosion related impacts to Clay-loving wild buckwheat habitat directly adjacent to the Carnation Cutoff road. This alternative will result in the removal of a threat of "High Imminence" on approximately 151.4 acres of occupied habitat.

Cumulative Impacts –

This alternative would have similar positive cumulative effects for the conservation of clay-loving wild buckwheat as the Proposed Action. While slightly less of the Carnation population would be protected from the documented threats under this alternative it would still contribute to the recovery of the species as intended under the Endangered Species Act.

Alternative 2 –

This alternative would construct 6 fenced in exclosures, requiring 4,013 linear feet fencing, to serve as physical barriers to off route OHV vehicle use on the most critical Clay-loving wild buckwheat habitat where direct off route motorized impacts are most pronounced. This alternative would require 0.76 miles fencing to achieve 40 acres of plant and habitat protection.

This alternative offers the least amount of protection and conservation of habitat and natural processes in the area surrounding the plants. This alternative would protect approximately 40 acres of occupied Clay-loving wild buckwheat habitat in the project area 74% less than the proposed action. Outside of the fenced buckwheat population's off-route OHV use would likely continue, resulting in the continued expansion of observed impacts and degradation of Clay-loving wild buckwheat habitat. Those populations that are not proposed to have protective exclosures constructed would remain vulnerable to noncompliant OHV impacts. In addition indirect effects from erosion, weed proliferation, and dust deposition may affect those sub-populations within the exclosures commensurate with the level of OHV use that may occur.

This alternative arguably fails to meet the intent of the Gunnison Gorge NCA land use plan and the associated land use decisions that specifically provide for protection of sensitive plants from activities that are not compatible with the maintenance of rare plant populations. Also, because this alternative does not protect all the sub-populations or necessary habitat from the documented threats and impacts the alternative does not meet the BLM's obligations under the Endangered Species Act.

Cumulative Impacts –

This alternative is unlikely to substantially contribute to the cumulative conservation or recovery of clay-loving wild buckwheat because not all of the population would be protected from the documented threats occurring. Also, this alternative could subject the protected sub-populations to identified indirect effects as burgeoning OHV use continues to degrade associated habitat.

No Action Alternative –

Off-route OHV use would likely continue, resulting in continued non-compliance and the

continued expansion of detrimental impacts to Clay-loving wild buckwheat habitat. As the use of the Carnation area continues to increase some sub-populations would be extirpated or greatly diminished.

Finding on the Public Land Health Standard for Threatened & Endangered species:

The lands within the identified Clay-loving wild buckwheat habitat are not considered to be meeting the standard for Threatened, Endangered, or Sensitive species due to the documented impacts which is curtailing the species in the project area. Implementation of the proposed action would stop the impacts that are contributing the not meeting land health standard for sensitive species. The proposed action is expected to help the identified lands begin to move towards meeting standards as impacted sub-populations recover from the impacts resulting from motorized use.

TRANSPORTATION

Affected Environment:

The project area is within the Gunnison Gorge National Conservation Area (GGNCA). The GGNCA Resource Management Plan designated the affected area as limited to designated routes. 6200 Road (Carnation Rd) and Carnation Cutoff Road are the only designated routes open to the public within the project area. Both routes are designated as open to full size motorized use within the Record of Decision in 2004

Carnation Cutoff Road connects 6200 Road (Carnation Rd) with Candy Lane Road, and provides a “short cut” between the two areas. Both areas can be linked together via other roads and OHV routes.

Environmental Consequences:

Proposed Action – The closure of Carnation Cutoff Road, the fencing of the south side of 6200 Road (Carnation Rd), and the fencing of the south end of Carnation Cutoff Road would lead to loss of motorized and mechanized recreation opportunities on Carnation Cutoff Road for the 0.74 miles of the route that would be closed. Since the route is currently lightly used for mountain biking and OHV recreation, primarily as a short-cut from 6200 Road (Carnation Rd) to Candy Lane Road, the loss of mountain biking and OHV recreation opportunities would be slight, especially since there are alternate OHV routes in the area that connect the 6200 Road (Carnation Rd) with Candy Lane Road.

A small hiker maze would be installed in the fence south of the water tank. This would allow for continued access to the area for hikers, runners and dog walkers.

Tri-State would continue to have administration access on their right of way.

Cumulative Impacts –

There are 248 miles of designated roads and trails in Gunnison Gorge NCA. Of that, approximately 230 miles are open to OHV use. Closing the 0.74 mile section of Carnation Cutoff Road would be a loss of 0.3% of available OHV recreation miles. This loss of opportunity is so small that it would be considered negligible.

Alternative 1 –

There would be no effect to travel designations stated within the GGNCA Resource Management Plan.

Alternative 2 –

There would be no effect to travel designations stated within the GGNCA Resource Management Plan.

No Action Alternative –

There would be no effect to travel designations stated within the GGNCA Resource Management Plan.

RECREATION

Affected Environment:

Approximately 300 acres of public lands are accessed/influenced by Carnation Cutoff Road for recreational purposes in the project area. The area is mostly flat and lacking destination features (e.g., views, hills, challenging terrain, scenic features, etc.). The transportation designation for the area is “limited to designated routes.” 6200 Road (Carnation Rd) and Carnation Cutoff Road are the only designated routes open to the public within the project area.

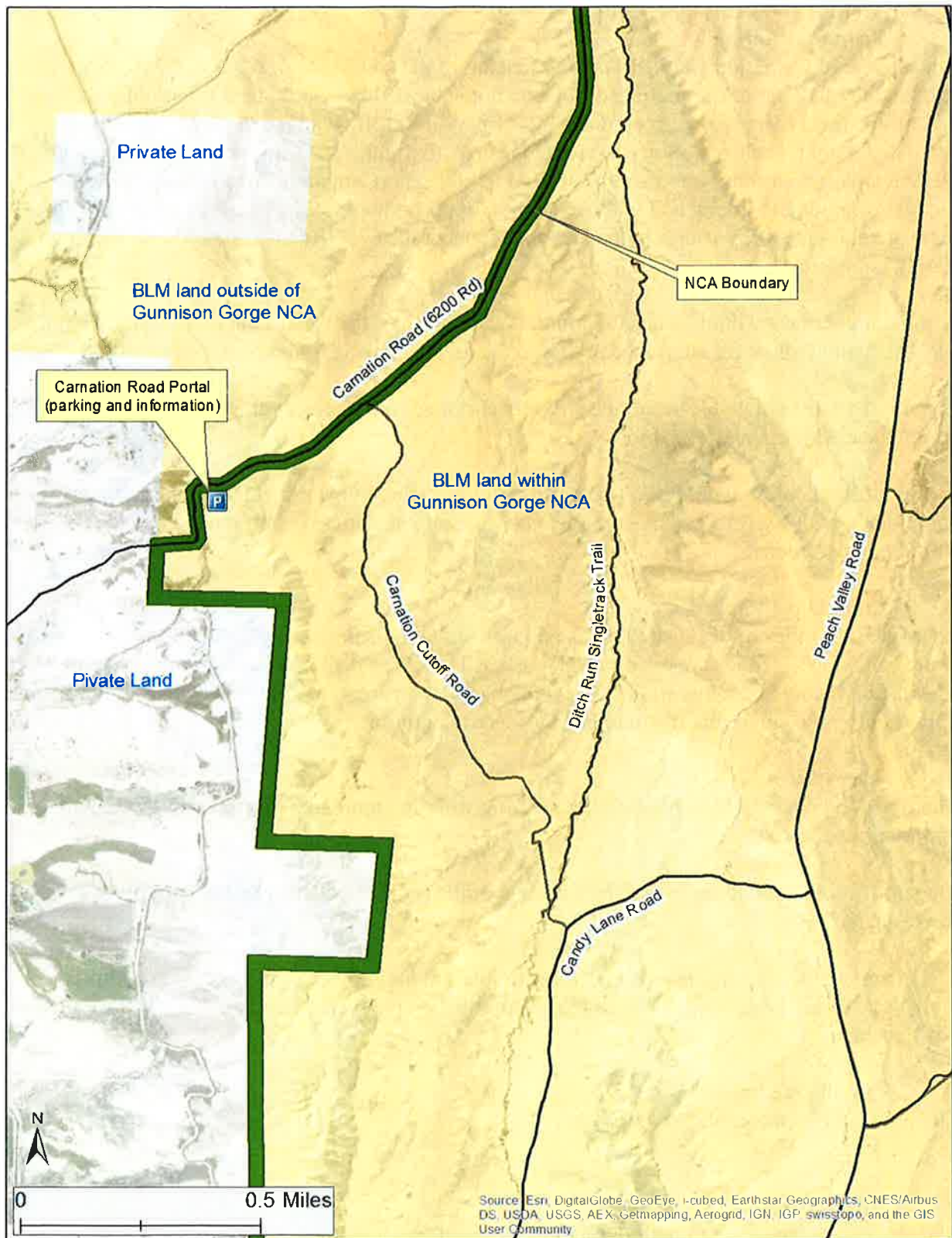
Field observations show that a few people use the Carnation Cutoff Road and some of the user-created routes in the vicinity for walking, running, dog-walking and mountain biking.

Carnation Cutoff Road connects 6200 Road (Carnation Rd) with Candy Lane Road, and provides a “short cut” between the two areas. Both areas can be linked together (without using Carnation Cutoff Road) via other roads and OHV routes. Being on the margins of more interesting, challenging and hilly terrain, and removed from the main OHV staging areas, Carnation Cutoff Road is lightly used by people participating in OHV recreation activities.

Although the transportation designation in the area limits OHV use to designated routes, it is clear that unauthorized off-route OHV use occurs in the area (see Figure 1). In addition to user-created routes, there is also unauthorized OHV use on the powerline road, which is only open to administrative use.

Many of the off-route disturbances are short, looping excursions off of Carnation Cutoff Road and the powerline administrative route. Field visits have shown that several of these intrusions, particularly in the buckwheat areas beneath and east of the powerline, are habitually used for recreational target shooting. However, target shooting is prohibited in Gunnison Gorge NCA (see Federal Register, Volume 75, pp. 18877 - 18881). Off-route vehicle tracks are strongly associated with target shooting locations. So we have a couple of illegal/unauthorized recreational activities occurring within and among the buckwheat populations.

In the project area, 6200 Road (Carnation Rd) defines the NCA boundary. Gunnison Gorge NCA is south of 6200 Road (Carnation Rd), and non-NCA BLM lands lie north of the road. Recreational target shooting is allowed on non-NCA BLM lands.



Environmental Consequences:

Proposed Action –

The closure of Carnation Cutoff Road, the fencing of the south side of 6200 Road (Carnation Rd), and the fencing of the south end of Carnation Cutoff Road would lead to loss of motorized and mechanized recreation opportunities on Carnation Cutoff Road for the 0.74 miles of the route that would be closed. Since the route is currently lightly used for mountain biking and OHV recreation, primarily as a short-cut from 6200 Road (Carnation Rd) to Candy Lane Road, the loss of mountain biking and OHV recreation opportunities would be slight, especially since there are alternate OHV routes in the area that connect the 6200 Road (Carnation Rd) with Candy Lane Road.

A small hiker maze would be installed in the fence south of the water tank (see Design Feature 6). This would allow for continued access to the area for hikers, runners and dog walkers.

Illegal off-route vehicle use would be strongly curtailed in the project area, increasing compliance with travel designations.

Illegal target shooting would likewise be strongly curtailed in the project area, increasing compliance with NCA rules. Legal target shooting opportunities on public land outside the NCA would not be affected.

Cumulative Impacts –

There are 248 miles of designated roads and trails in Gunnison Gorge NCA. Of that, approximately 230 miles are open to OHV use. Closing the 0.74 mile section of Carnation Cutoff Road would be a loss of 0.3% of available OHV recreation miles. This loss of opportunity is so small that it would be considered negligible.

Alternative 1 –

There would be no effect to hiking, running, dog walking, mountain biking or OHV recreation opportunities.

Illegal off-route vehicle use would be curtailed in the project area, increasing compliance with travel designations.

Illegal target shooting would be somewhat curtailed in the project area, increasing compliance with NCA rules. Legal target shooting opportunities on public land outside the NCA would not be affected.

Cumulative Impacts –

There would be no cumulative impacts.

Alternative 2 –

There would be no effect to hiking, running, dog walking, mountain biking or OHV recreation opportunities.

Outside of fenced buckwheat populations off-route OHV use would likely continue, resulting in continued non-compliance with the “limited to designated routes” transportation designation.

Illegal target shooting would likely continue within much of the project area, but be eliminated from the fenced buckwheat locations.

Cumulative Impacts –

Off-route vehicle impacts would accumulate over time, leading to degradation of the recreation setting. Likewise, shooting impacts (trash, spent casings and shells, abandoned targets) would continue to accumulate and require staff time to clean up and remove.

No Action Alternative –

There would be no effect to hiking, running, dog walking, mountain biking or OHV recreation opportunities.

Off-route OHV use would likely continue, resulting in continued non-compliance with the “limited to designated routes” transportation designation.

Illegal target shooting would likely continue within the project area.

CUMULATIVE IMPACTS SUMMARY

Cumulative effects include the effects of future State, tribal, local, or private actions that are reasonably certain to occur in the action area considered in this EA. In the action area, BLM lands occur in a mixture of private, local, State, and other Federal lands, with private lands dominating. No tribal lands occur inside the action area.

Activities that occur on non-BLM lands within the action area include agriculture and ranching; residential development; utility line development; road development; and recreation, including hunting, OHV use, hiking, and mountain biking. The human population in the area has grown tremendously since 1990. This growth is likely to continue at near current rates for the foreseeable future, which will result in increased pressure from development and recreation on private, local, and State lands.

The Grand and Uncompahgre Valleys support a major agricultural industry and growing residential development. These activities will continue to affect clay-loving wild buckwheat through direct loss of plants and habitat, and through habitat modification. New construction, development and maintenance of irrigation systems, use of herbicides, and increased pressure from recreation associated with residential development may affect the species. Effects are likely to be substantial for clay-loving wild buckwheat, which occurs on the Uncompahgre Valley floor within and around the communities of Delta and Montrose. Between 1990 and 2009, these cities grew approximately 144 and 108 percent, respectively (U.S. Census Bureau 2012). Development has been particularly rapid in this region and is

expected to expand as area cities continue growing. FWS estimate that about 40 percent of clay-loving wild buckwheat habitat has already been impacted by development or agriculture (FWS 2009b). As development continues within the action area, recreational activities (e.g., OHVs) are likely to increase on private and federal lands.

E. Persons/Agencies /BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Gina Glenne	Botanist	US Fish and Wildlife Service

INTERDISCIPLINARY REVIEW: The following BLM personnel have contributed to and have reviewed this environmental assessment.

<u>Name</u>	<u>Title</u>	<u>Area of Responsibility</u>
Ken Holsinger	Biologist	T&E Plants
Glade Hadden	Archaeologist	Cultural Resources
Edd Franz	Outdoor Rec Planner	Recreation, Access and Transportation, VRM
Julie Jackson	Outdoor Rec Planner	Assisted with Access and Transportation
Teresa Pfifer	Lands and Minerals Staff Lead	Realty

References

- Bureau of Land Management. 2009. Biological assessment for federally protected species and designated critical habitat for an amendment to the Uncompahgre Basin and San Juan – San Miguel Resource Management Plans: Limiting motorized and mechanized travel to existing routes. Prepared May 12, 2009. 41 pp.
- Ewing, C., and G. Glenne. 2009. Colorado Natural Heritage Program Plant Element Occurrence Field Form, map, and photos from *Eriogonum pelinophilum* Element Occurrence 025. Unpublished form from February 12, 2009. 9 pp.
- Gunnison Gorge National Conservation Area. 2004. Gunnison Gorge National Conservation Area approved resource management plan. November 2004. 180 pp. + appendices.
- Ouren, D.S., C. Haas, C.P. Melcher, S.C. Stewart, P.D. Ponds, N.R. Sexton, L. Burris, T. Francher, and Z.H. Bowen. 2007. Environmental Effects of Off-Highway Vehicles on

Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources. Open-File Report 2007-1353 prepared by the U.S. Geological Survey. 225 pp.

U.S. Fish and Wildlife Service. 2009. *Eriogonum pelinophilum* (clay-loving wild buckwheat) 5-Year Review: Summary and Evaluation. Prepared September 2009, by Gina Glenne, Grand Junction, CO.

**U.S. Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 S. Townsend Ave.
Montrose, CO 81401**

Finding of No Significant Impact (FONSI)

DOI-BLM-CO-S054-2013-0041 EA

Location: In Montrose County, Colorado.

The Public Lands Within: Township 51 North, Range 9 West, Sections Section 29 SE $\frac{1}{4}$ SE $\frac{1}{4}$, and Section 30 NW $\frac{1}{4}$ SW $\frac{1}{4}$

Project Name: Carnation Road Buckwheat Protection

Applicant: US DOI, Bureau of Land Management, Uncompahgre Field Office

Background

Surveys recently conducted by BLM for the endangered Clay-loving wild buckwheat (*Eriogonum pelinophilum*) have documented that several large populations within Gunnison Gorge National Conservation Area south of 6200 Road (also known as Carnation Road) are being negatively impacted by motorized travel adjacent to an authorized OHV route and unauthorized user created OHV routes (Figure 1), as well as unauthorized target shooting. Compliance with the existing Land Use Plan and meeting the legal requirements of the Endangered Species Act has resulted in the need to develop a reasonable method of protecting this population from further detrimental impacts (Photo 1-4).

Under the Gunnison Gorge National Conservation Area (GGNCA) Resource Management Plan (November 2004), motorized travel in the project area is limited to designated routes. Within the project area, the only designated route is the route labeled Carnation Cutoff in Figure 1.

Finding of No Significant Impact

Based on the analysis of potential environmental impacts contained in DOI-BLM-CO-S054-2013-0041 EA, I have determined that the Proposed Action will not have a significant effect on the human environment. The proposed action includes design features as part of the proposed action to minimize the impacts from the proposed action on other resource values (listed in the EA; pg 8-9).

Rationale

This FONSI is based on my consideration of the Council on Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), with regard to the context and the intensity of impacts described in the EA.

Context

The proposed action is in East central Montrose County, CO, approximately 5 miles Northeast of the town of Olathe. The project is located on approximately 300 acres of BLM managed public lands. The proposed action is located at elevation of approximately 6,200 feet, in an area containing rolling open salt desert shrubland that sees substantial recreational activity. The area of analysis of the site-specific EA is generally the lands and OHV routes affected by the proposed action (Figure 1 in the EA).

Intensity

1) Impacts that may be both beneficial and adverse.

Beneficial impacts include the remediation of documented detrimental impacts from motorized travel to an area that contains the endangered Clay-loving wild buckwheat. Stopping the continued expansion of detrimental impacts is essential to the long term persistence of the species in the project area. Eliminating motorized travel in the project area would also alleviate indirect affects to the species and associated habitat by reducing erosion and weed proliferation that curtail Clay-loving wild buckwheat persistence. Implementation of the proposed action is not expected to have adverse impacts to the species or its habitat.

The project will result in the loss of 0.74 miles of motorized OHV opportunity and the development of approximately 300 acres that are not accessible by motorized vehicles.

2) The degree to which the proposed action affects public health and safety.

The proposed action is not expected to cause adverse public health and safety effects.

3) Unique Characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The project area occurs within the Gunnison Gorge National Conservation Area which was designated in part due to the majority of Clay-loving wild buckwheat occurrences on public lands occurring within the NCA planning area.

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

Public perception of the project could create some controversy over concerns about route closures. Motorized use organizations were contacted during scoping for the project with no

responses stating concern about the loss of motorized opportunity as a result of the project. The quality and use of the human environment in the project area is understood, has been analyzed, and is not highly controversial from a scientific standpoint. Design features within the proposed action address and mitigate these concerns.

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

There are no known effects on the human environment that are expected to be highly uncertain or that may involve unique or unknown risks.

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

Approval of this proposed action would not create a precedent for future threatened or endangered species management activities. Any future proposals would have to be evaluated on their own merits based on the issues and impacts related to the location, timing, and intensity of each action. The proposed action does not set a precedent for a future consideration.

7) Consideration of the action in relation to other actions with individually insignificant but cumulatively significant impacts.

Other projects, including other fencing and/or travel management projects, are foreseeable; but considering past and foreseeable projects, it is not anticipated that cumulative impacts of any significance would occur. The limited scale of activity creates minimal individual effects, as well as minimal cumulative effects when added to the existing situation and other potential activities.

8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.

Field surveys were completed; no cultural or historic sites would be affected by this decision. If any unidentified sites are discovered during implementation, they would be avoided or mitigated so that they would not be impacted.

9) The degree to which the action may adversely affect an endangered or threatened species or its critical habitat.

No endangered, threatened, candidate or proposed species would be adversely affected by the project. With compliance from the public the project is expected to be wholly beneficial for the endangered Clay-loving wild buckwheat (*Eriogonum pelinophilum*). All listed species potentially occurring within the Uncompahgre Field Office were considered. No adverse impacts to endangered, threatened, or sensitive species or their habitat have been identified. Nevertheless, design features within the proposed action specify measures for the protection of sensitive plant species. With strict adherence to identified design features no impacts, including

minor short-term impacts, to endangered, threatened or sensitive species are expected.

10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The Proposed Action does not violate or threaten violation of any federal, state, local, or tribal law or requirement imposed for the protection of the environment. The proposed action is in compliance with Section 7(a)1 of the Endangered species Act which directs BLM to carry out programs for the conservation of endangered species.

Determination

This Finding of No Significant Impact is based on the information contained in the EA and my consideration of criteria for significance (40 CFR 1508.27). It is my determination that: 1) the implementation of the proposed action will not have significant environmental impacts; 2) the Proposed Action is in conformance with the Uncompahgre Basin Resource Management Plan; and 3) the Proposed Action does not constitute a major federal action having significant effect on the human environment. Therefore, an Environmental Impact Statement is not necessary.

Approved:



Barbara Sharrow
Field Manager
Uncompahgre Field Office

⁸⁵
10-19-14
Date

**U.S. Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 South Townsend Avenue
Montrose, CO 81401**

Decision Record

(DOI-BLM-CO-S054-2013-0041 EA)

PROPOSED ACTION TITLE: Carnation Road Buckwheat Protection

DECISION: It is my decision to implement the Carnation Road Buckwheat protective fencing project and to close 0.74 miles of designated road to prevent further detrimental impacts from occurring to several large populations of the endangered Clay-loving wild buckwheat.

Excluding OHV activity is needed for several large populations of Clay-loving wild buckwheat to stop the well documented detrimental impacts that have occurred and to prevent further degradation of the populations. Public use will be limited to pedestrian and equestrian activity. This fencing effort will result in a 2,350 feet long fence paralleling the south side of 6200 Road and will block vehicle access to existing and user created routes through these large populations. A second segment of fence would be constructed at the southern end of the project area to block off and permanently restrict vehicular use coming from the south off of the Candy Lane Road. This would result in the permanent closure to motorized vehicles on 0.74 miles of road (Carnation Cutoff) that was designated in the GGNCA land use plan. Two locked gates will be added to provide administrative access to the service routes for the Tri-State Montrose to Delta 320 KV powerline, one at the junction of the powerline service route and 6200 Road, and one at the currently approved vehicle access route south of 6200 (see **Figure 1**). Limiting the powerline service route to administrative use only would be necessary in order to facilitate the recovery of these populations and to prevent recreational vehicle access to the populations from other locations, while still allowing Tri-State necessary access to the permitted right-of-way. The fences would be constructed out of woven wire and be constructed to BLM standards depicted in Figure 2.

The fence would parallel 6200 Road (Carnation Rd) starting on the west end at the ridge top approximately 150 feet west of an unauthorized user created single track route, just south of the water tower, and continue in a northeasterly direction along the south side of the existing county road for approximately 2,350 feet until it ties in with the substantial and unnavigable wash just southeast of 6200 Road. Due to the wash's unnavigable nature it would serve as the northeastern boundary. The northwestern terminus of the 6200 Road (Carnation Rd) and both ends of the southern Candy Lane area fence would be situated mid-slope on very steep slopes which should deter circumvention of these fences. Should user created recreational impacts continue to be

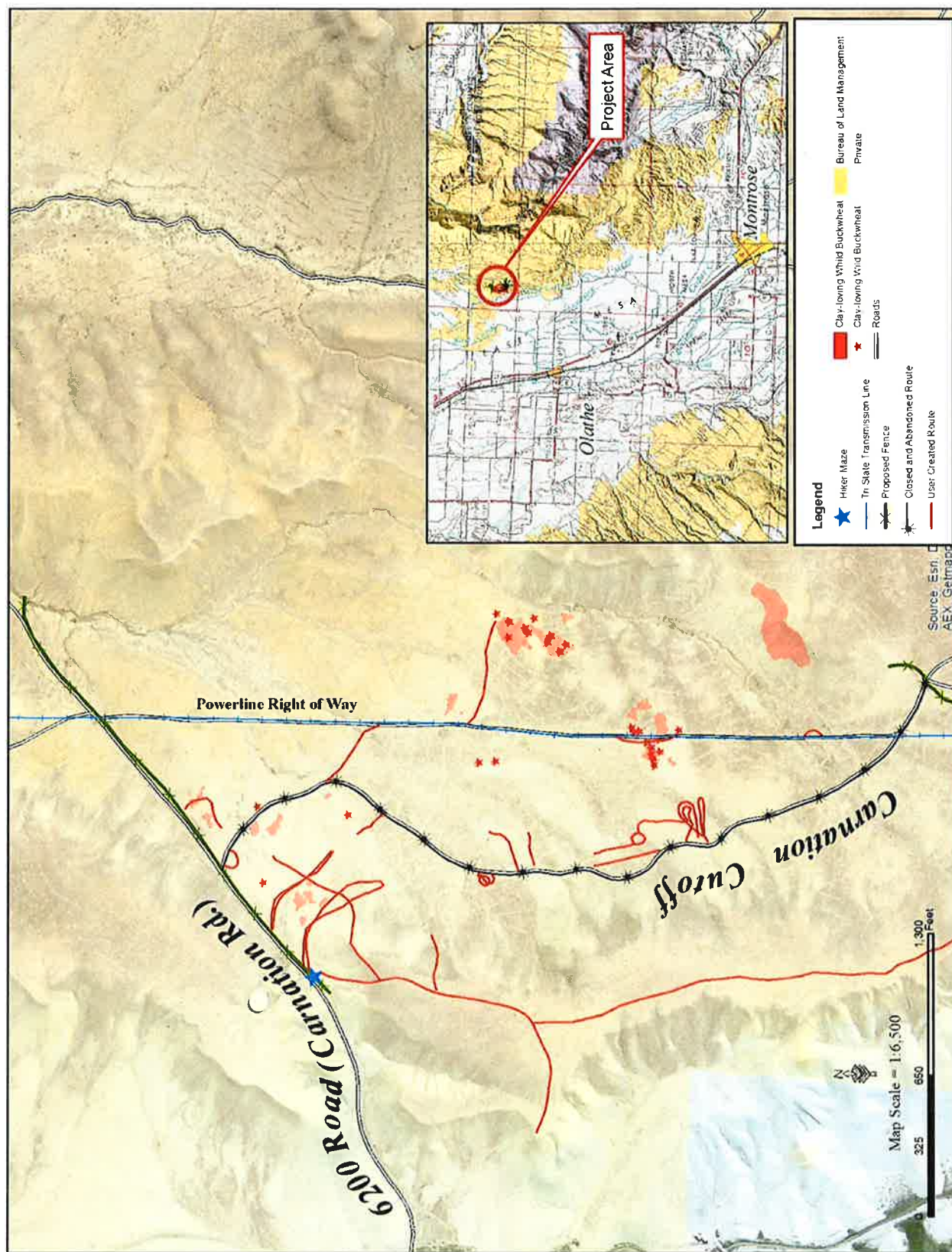
observed on the south side of the proposed fence then the protective fencing would be extended as necessary and designated routes closed to appropriately protect these populations of buckwheat, while considering cost and impacts to the resource. The fence line would be kept approximately 3.5 meters off of the existing 6200 Road (Carnation Rd) to allow for road maintenance except in instances where the Clay-loving wild buckwheat would be affected, in which case the fence would be moved closer to the existing road without impinging on the ability for the county to do appropriate maintenance. The southern fencing effort would also be extended as necessary to maintain effective closure of the southern end of the project area should compliance become an issue. The additional fencing, if necessary, would terminate at effective physical barriers to deter motorized use of the closed area. The site would then be allowed to recover naturally.

Design Features:

1. Avoidance. Work crews would take measures to avoid ground disturbance within 3 feet of any Clay-loving wild buckwheat plant and no posts would be installed within 3 feet of any plant. Crews would access fencing locations through pre-existing roads, or take appropriate measures to minimize ground disturbance in un-occupied habitat. Off-highway vehicle use would be restricted to existing routes around or through occupied habitat (Figure 1). These designated areas would be flagged by a qualified compliance biologist and all plants within 3 feet would be flagged and avoided by construction activities.
2. Employee Education. A worker education and awareness program for Clay-loving wild buckwheat would be developed and presented by BLM to all personnel who work on the project. No personnel would be allowed to work on the project until they have completed this orientation. The program would include: (1) Information on the legal and biological status of Clay-loving wild buckwheat, (2) what habitats are important to the species, (3) where occurrences are located on the project area, (4) awareness of mandatory conservation measures, (5) information on fines and penalties for damaging or directly impacting Clay-loving wild buckwheat, and (6) reporting procedures should any violation occur. If any Clay-loving wild buckwheat plants are directly impacted by project activities, construction would be halted immediately and consultation with the Service would be re-initiated.
3. Biological Monitoring. The BLM would be on-site for certain construction activities with the greatest likelihood for impacting adjacent Clay-loving wild buckwheat. These activities include the following: (1) Initial fence post location flagging, and (2) fence installation. It is the responsibility of the construction manager to maintain and communicate a construction schedule with the biologist to ensure that monitoring activities are planned for and carried out. Prior to fence construction, a qualified compliance biologist must survey and pin flag all Clay-loving wild buckwheat plants along the fencing route and all fencing activities must be monitored by the compliance biologist. Crews would be required to work in dry conditions and to avoid any direct impacts to Clay-loving wild buckwheat plants.
4. Work with Tri-State to ensure that appropriate administrative access is maintained for the powerline right-of-way.

5. Signage will be installed at the ends of the closed Carnation Cutoff road where it will intersect open routes with fencing, explaining the reason for the closures and alternative routes to the public.
6. A small hiker maze will be installed in the fence just south of the water tank to allow foot access to the area away from buckwheat populations.
7. Regular patrols of the closed area would be made by BLM staff to monitor the effectiveness of the closures. Where damage to the fences is observed they would be promptly repaired. Patrols would also monitor for potential circumvention of the fences and assess the need to extend them accordingly.
 - Law Enforcement: The project site would be added to the list of routine stops for GGNCA patrol route (1/week)
 - Remainder of BLM staff: at least twice a month for the first year, patrols could then be reduced to once a month if compliance is observed.
 - BLM will solicit its partners to develop a site steward program for the project area to also help increase monitoring presence (i.e. Colorado Natural Areas Program, Colorado Canyons Association, or members of the Colorado Native Plant Society)
8. The project area will be monitored annually for a minimum of three years for noxious weeds. Should noxious weeds be found within the project area they would be treated in accordance with the Uncompahgre Field Office Weed Management Plan (DOI-BLM-CO-S050-2012-0029 EA).

Figure 1. Project Map



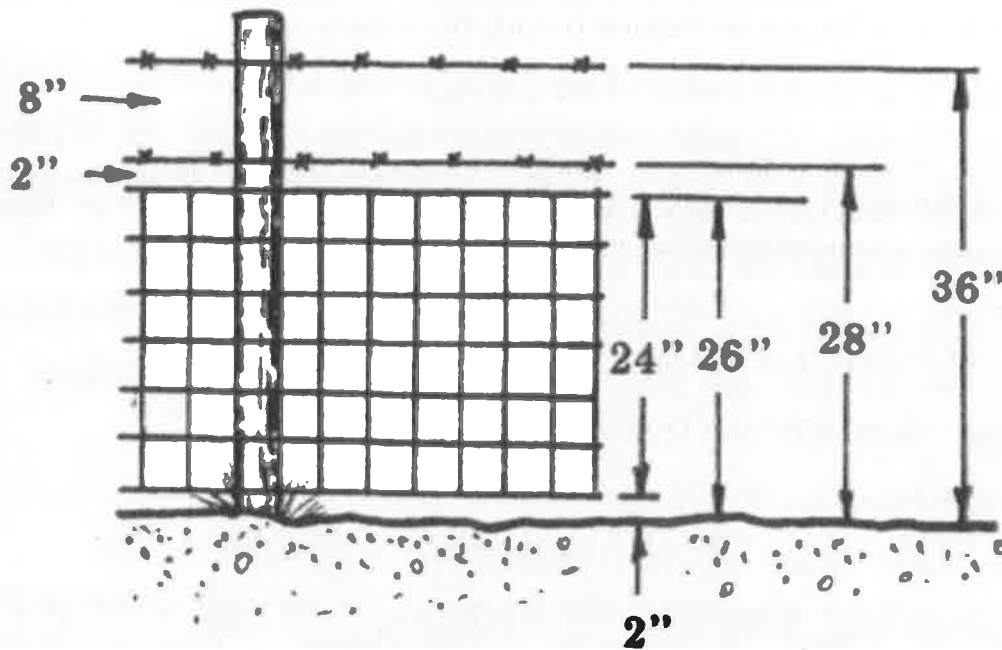


Figure 2. Fence specifications

MITIGATION MEASURES: Mitigation for sensitive species has been incorporated into the proposed action as design features.

MONITORING:

The BLM will be on-site for the construction activities with the greatest likelihood for impacting adjacent Clay-loving wild buckwheat. These activities include: (1) Initial fence post location flagging, and (2) fence installation. It is the responsibility of the construction manager to maintain and communicate a construction schedule with the biologist to ensure that monitoring activities are planned for and carried out. Prior to fence construction, a qualified compliance biologist must survey and pin flag all Clay-loving wild buckwheat plants along the fencing route and all fencing activities must be monitored by the compliance biologist. Crews would be required to work in dry conditions and to avoid any direct impacts to Clay-loving wild buckwheat plants.

Regularly scheduled monitoring of fence integrity and user compliance would be conducted by BLM staff.

RATIONALE: The project serves to mitigate detrimental impacts that are occurring, as a result of compliant and non-compliant motorized recreation, on the federally endangered Clay-loving wild buckwheat and its habitat. This project is in compliance with the Gunnison Gorge National Conservation Area RMP. The proposed action will continue to implement land use plan and implementation level decisions in accordance with the Gunnison Gorge National Conservation Area Land Use Plan. The Proposed Action does not constitute a major federal action having significant effect on the human environment.

COMPLIANCE WITH MAJOR LAWS: The decision is in compliance with applicable laws, regulations and policy, including the Endangered Species Act, Migratory Bird Treaty Act, Clean Water Act, Clean Air Act, and the National Historic Preservation Act.

APPEALS:

Within 30 days of receipt of this decision, you have the right of appeal to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations at 43 CFR 4.400. Appeal and stay procedures are outlined in Form CO-050-1842-1.

NAME OF PREPARER: Ken Holsinger

NAME OF ENVIRONMENTAL COORDINATOR: Jedd Sondergard

DATE

10/8/14

SIGNATURE OF AUTHORIZED OFFICIAL

Barbara Sharrow

Barbara Sharrow
Field Manager
Uncompahgre Field Office

DATE SIGNED

10-14-14